

EXHIBIT 113

Lindsay Cooper

From: John Neukom
Sent: Friday, April 21, 2017 8:47 AM
To: Lindsay Cooper
Subject: Fwd: Waymo v. Uber discovery issues

From: John Cooper <JCooper@fbm.com>
Date: April 20, 2017 at 5:58:28 PM PDT
To: 'John Neukom' <johnneukom@quinnemanuel.com>, "Gonzalez, Arturo J." <AGonzalez@mofo.com>
Cc: Matthew Cate <MCate@fbm.com>, Barbara Restivo <BRestivo@fbm.com>
Subject: Waymo v. Uber discovery issues

John and Arturo:

A meeting that included each of you was held today in the offices of Farella, Braun + Martel to address outstanding discovery issues in this action. Special Master stated at the outset that he would prepare and circulate an email summarizing his understanding of the results of that meeting and any agreements reached among the parties. The following is that email.

Waymo's 22 RFPs

The parties tabled this issue so Waymo could review Uber's productions.

Waymo's Deponent RFPs

Linaval RFP # 1 and Meall RFP # 3

Uber agreed to search for documents, beyond just the respective deponents' files, sufficient to show presentations or discussions (including valuations and components thereof) and regarding. Given time pressures, Uber will produce a limited number of documents sufficient to show the requested information without prejudice to Waymo seeking more materials at a later date.

- Uber's acquisition of Otto
- Otto's acquisition of Tyto

Linaval RFP # 6

- Waymo agreed to provide the names of two individuals whom it believes might have information responsive to this request.
- Uber agreed to search the two identified custodian's files for that information.

Boehmke RFP #4

Waymo agreed to narrow its request to cover information regarding the LiDAR-related consulting work that Levandowski performed before his employment at Uber. Uber agreed to search, beyond just Boehmke's files, for responsive documents. Due to time pressures, Uber will produce a limited number of documents sufficient to show the requested information without prejudice to Waymo seeking more materials at a later date

Haslim RFP # 4

Waymo explained that it seeks documents sufficient to show the negotiation regarding and determination of the Milestones referenced in UBER00006451. Uber agreed to search, beyond just Haslim's files, for documents responsive to this request.

Uber's Privilege Log

Waymo agreed to provide a follow-up explanation of categories of concerns it has regarding Uber's privilege log. Waymo agreed also to provide concrete examples or citations to the privilege log that illustrate the issues of concern.

Designations in Chu Transcript

Waymo agreed to revisit its confidential and AEO designations.

Page Deposition

Waymo stated that it would review the deposition notice and accompanying RFPs. Waymo said it would make best efforts, given Friday's filing deadline, to provide a written statement of its position regarding both the deposition and the RFPs on Friday.

Uber's Search of Levandowski's Files

Uber represented that it has previously applied both its and Waymo's search terms to Levandowski files on Uber and Otto servers. Uber represented that all documents responsive to those searches have been either produced or entered on Uber's privilege log. Uber said that it had not searched Levandowski's personal computer or files (on Uber/Otto servers) in connection with the deponent RFPs due to Levandowski's assertion of the Fifth Amendment.

Please advise if you disagree with this summary or wish to make additions.

Regards, John

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Farella Braun + Martel LLP